

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether material designated confidential by Uber should be sealed.

On March 14, 2025, Plaintiffs filed amended bellwether complaints. The complaints include information derived from Defense Fact Sheets and documents produced in discovery that Uber has designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the protective order.

Material To Be Filed Under Seal

The material to be filed under seal is portions of Plaintiffs' amended bellwether complaints.

Document	Description	Designating Party
[Unredacted] C.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.R.1 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] J.E. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber

Document	Description	Designating Party
[Unredacted] LCHB128 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Jane Doe QLF 001 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] T.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] B.L. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Jaylynn Dean Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.R.2 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] A.G. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] K.E. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] D.J. Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] Amanda Lazio Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1486 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 318 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1898 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 407 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber
[Unredacted] WHB 1876 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber

Document	Description	Designating Party
[Unredacted] WHB 823 Amended Bellwether Complaint	Portion of complaint referring to documents and information designated confidential or highly confidential	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Annie M. Wanless in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: March 14, 2025

Respectfully submitted,

By: /s/ Sarah R. London

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FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: March 14, 2025

By: /s/ Annie M. Wanless
Annie M. Wanless